| 1  | GIA N. MARINA Nevada Bar No. 15276 CLARK HILL PLLC 1700 South Pavilion Center Drive, Suite 500 Las Vegas, Nevada 89135 E-mail: gmarina@clarkhill.com Telephone: (702) 862-8300 |  |  |
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| 4  |  |  |  |
| 5  | Facsimile: (702) 778-9709 Attorney for Defendant   |  |  |
| 6  | Equifax Information Services LLC   |  |  |
| 7  |  |  |  |
| 8  | UNITED STATES DISTRICT COURT   |  |  |
| 9  | DISTRICT O   | F NEVADA   |  |
| 10 | YVETTE FREY,   | Case No. 2:24-cv-00311-RFB-BNW                         |  |
| 11 | Plaintiff,   |  |  |
| 12 | vs.  | JOINT MOTION FOR EXTENSION OF                          |  |
| 13 | TRANS UNION LLC; EXPERIAN  | TIME FOR DEFENDANT EQUIFAX INFORMATION SERVICES LLC TO |  |
| 14 | INFORMATION SOLUTIONS, INC. and  | FILE ANSWER  |  |
| 15 | EQUIFAX INFORMATION SERVICES, LLC,   | FIRST REQUEST  |  |
| 16 | Defendants.  |  |  |
| 17 |  |  |  |
| 18 |  |  |  |
| 19 | Defendant Equifax Information Services LLC ("Equifax") has requested an extension of   |  |  |
| 20 | time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has  |  |  |
| 21 | no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED  |  |  |
| 22 | to by and among counsel, that Defendant Equifax Information Services LLC's time to answer, move  |  |  |
| 23 | or otherwise respond to the Complaint in this action is extended from March 8, 2024 through and  |  |  |
| 24 | including <b>April 8, 2024</b> . The request was made by Equifax so that it can have an opportunity to   |  |  |
| 25 | collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff  |  |  |
| 26 | approves. This stipulation is filed in good faith and not intended to cause delay.   |  |  |
| 27 | approximation is filed in good future an   | and menada to each actus.                              |  |
| 28 |  |  |  |

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| 1  | Respectfully submitted, this 7 <sup>th</sup> day of March, 2024.        |   |
|----|---|---|
| 2  |   |   |
| 3  | CLARK HILL PLLC   | No opposition   |
| 4  | By: /s/ Gia N. Marina   | /s/ Gerardo Avalos  |
| 5  | Gia N. Marina<br>Nevada Bar No. 15276                                   | George Haines, Esq.<br>Nevada Bar No. 9411                              |
| 6  | 1700 South Pavilion Center Drive, Suite 500<br>Las Vegas, Nevada 89135  | Gerardo Avalos, Esq.<br>Nevada Bar No. 15171                            |
| 7  | Telephone: (702) 862-8300<br>Facsimile: (702) 778-9709                  | FREEDOM LAW GROUP   |
| 8  | Email: gmarina@clarkhill.com Attorney for Defendant Equifax Information | 8985 S. Eastern Ave., Suite 350<br>Henderson, NV 89123                  |
| 9  | Services LLC  | Phone: (702) 880-5554<br>Fax: (702) 385-5518                            |
| 10 |   | Email: ghaines@freedomlegalteam.com Email: gavalos@freedomlegalteam.com |
| 11 |   | Attorneys for Plaintiff   |
| 12 |   |   |
| 13 | IT IS SO ORDERED:   |   |
| 14 |   |   |
| 15 | Benbucken   |   |
| 16 | United States Magistrate Judge  |   |
| 17 | DATED: <u>3/8/2024</u>  |   |
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## **CERTIFICATE OF SERVICE** I hereby certify that a true and exact copy of the foregoing has been served this 7<sup>th</sup> day of March, 2024, via CM/ECF, upon all counsel of record: By: /s/ Nicholas DiMattei, Jr. An employee of Clark Hill PLLC